



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

July 12, 2024

Via ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Terrorist Attacks of September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

We write on behalf of the Federal Bureau of Investigation (“FBI”) to provide a set of materials for the Court’s *in camera* review. As we indicated in our July 10, 2024 status letter, ECF No. 10077, we have been working with several of the parties to assemble a set of the briefs and averments (with the exception of Exhibit 700, *see id.*) that identify all FBI redactions that remain at issue, as well as the Kingdom of Saudi Arabia’s (“KSA’s”) MDL redactions, so that the Court may review those materials *in camera* in connection with the PECs’ unsealing application.

Please find attached the following documents, which have FBI information highlighted for redaction in red and MDL information highlighted for redaction in yellow, which are being filed as exhibits to this letter under seal.

- Briefs related to Dallah Avco’s (“DA’s”) renewed motion to dismiss¹
 - Exhibit A: The Plaintiffs’ Executive Committee’s (“PECs”) opposition brief (ECF No. 9537)
 - Exhibit B: DA’s reply brief (ECF No. 9607)
- Briefs related to KSA’s renewed motion to dismiss
 - Exhibit C: KSA’s opening brief (ECF No. 9369)
 - Exhibit D: The PECs’ opposition brief (ECF No. 9539)
 - Exhibit E: KSA’s reply brief (ECF No. 9610)

¹ DA’s opening brief does not contain any protected information and was publicly filed as ECF No. 9363.

- Exhibit F: The PECs' surreply brief (ECF No. 9706)
- Factual averments
 - Exhibit G: KSA's averment (ECF No. 9390-1)
 - Exhibit H: The PECs' response to KSA's averment (ECF No. 9542)
 - Exhibit I: KSA's response to the PECs' averment² (ECF No. 9611-1)
 - Exhibit J: DA's response to the PECs' averment (ECF No. 9608)

Please note that these versions include all of the redactions requested by KSA (and DA has not requested any redactions) but do not identify the redactions requested by third parties.

We thank the Court for its consideration of this submission.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

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cc: counsel for the PECs, KSA, DA (by ECF)

² The PECs' Averment, ECF No. 9541-1, is not separately included in this set of materials because it is copied in full into KSA's response to it.